

LISA SCOLARI
Attorney at Law
20 VESEY STREET, SUITE 400
NEW YORK, NEW YORK 10007
scolarilaw@gmail.com

TEL. (212) 227-8899

FAX (212) 964-2926

May 27, 2021

Hon. Sidney H. Stein
United States District Court
500 Pearl Street
New York, NY 10007
via ECF and email
via email: laura_blakely@nysd.uscourts.gov

MEMO ENDORSED

Re: United States v. Peng Cuodengzhu
21 Cr. 320 (SH)

Your Honor,

I write to request a temporary modification of Mr. Cuodengzhu's bond so that he may stay overnight, potentially three nights at Long Island Jewish Hospital in Forest Hills for the birth of his first child. Due to the pandemic partners are not permitted to come and go from the hospital and are required to enter with the birth mother and stay until the child is born. Mr. Cuodengzhu and his partner have been told to come to the hospital on May 30, 2021 and be prepared to stay over through June 1, 2021 if necessary. As this is both parents' first child it is not clear that the baby will arrive as predicted, so I am requesting permission for Mr. Cuodengzhu to spend up to three nights in the hospital when the birth is actually occurring.

Mr. Cuodengzhu has been released on a fifty thousand dollar personal recognizance bond co-signed by two financially responsible suretors, he has surrendered his passport to pretrial, he is subject to electronic monitoring and a curfew and his travel is restricted to the Southern and Eastern Districts of New York and the District of New Jersey.

The government, by Jacob Gutwillig, consents to this request. Mr. Cuodengzhu's pretrial Officer Bernisa Mejia reports that his compliance with pretrial release has been excellent. Pretrial defers to the government's position.

Therefore I request that Mr. Cuodengzhu's bond be modified so that he can spend three nights at Long Island Jewish Hospital in Queens for the birth of his child.

Respectfully,

Lisa Scolari

Lisa Scolari

SO ORDERED:


HON. SIDNEY H. STEIN

Dated: New York, New York

May 27, 2021

cc: Jacob Gutwillig, Esq. via email